

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.
SUMNER SQUARE
1615 M STREET, N.W.
SUITE 400
WASHINGTON, D.C. 20036-3215
—
(202) 326-7900
FACSIMILE:
(202) 326-7999

December 18, 2018

Via ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

I write on behalf of the Kingdom of Saudi Arabia (“Saudi Arabia”), pursuant to ¶ III(d) of the Court’s Individual Practices in Civil Cases, concerning a letter that Saudi Arabia is submitting today in response to the letter filed by the Plaintiffs’ Executive Committees (“Plaintiffs”) on December 12, 2018.

Saudi Arabia’s letter response refers to and discusses material that is Protected Information under the Privacy Act Order and Protective Order for FBI Documents entered by this Court on November 14, 2018 (ECF No. 4255). Accordingly, counsel for Saudi Arabia has met and conferred with the Department of Justice, which represents the FBI in this matter. Saudi Arabia has proposed redactions to the letter to prevent the disclosure of Protected Information, and the FBI has approved those proposed redactions.

Immediately after the filing of this letter, counsel for Saudi Arabia will submit to chambers by electronic mail: (1) a copy of this letter; (2) a complete copy of Saudi Arabia’s letter response to Plaintiffs, with all proposed redactions shown in yellow highlighting; and (3) clean copies of only those pages of Saudi Arabia’s letter response as to which any redaction is proposed. Counsel for Plaintiffs will be copied on the submission to chambers.

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

The Honorable Sarah Netburn
December 18, 2018
Page 2

Saudi Arabia respectfully requests that the Court accept the filing and proposed redactions.

Respectfully submitted,

/s/ *Michael K. Kellogg*

Michael K. Kellogg
Counsel for the Kingdom of Saudi Arabia

cc: Chambers of the Honorable George B. Daniels (via facsimile)
All MDL counsel of record (via ECF)